

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: JAN 11 2008

KESIA PRICE, Individually and on Behalf
of All Other Persons Similiarly Situated,

Plaintiffs,

-against-

PORTER NOVELLI, INC. and OMNICOM
GROUP, INC.,

Defendants.

07 Civ. 5869 (PAC)

SUPPLEMENTAL AND
AMENDED CASE
MANAGEMENT PLAN AND
SCHEDULING ORDER

The Civil Case Management Plan and Scheduling Order dated and filed September 18, 2007 is hereby supplemented and amended as follows:

1. Paragraph 5 and 13 are hereby amended: All fact discovery shall be completed no later than March 14, 2008.
2. Paragraphs 6(c) and 13 are hereby amended: Depositions to be completed by March 14, 2008.

SO ORDERED:

By:


HON. PAUL A. CROTTY
United States District Judge

Dated: New York, New York
January 11, 2008

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January 10, 2008

VIA E-MAIL

Hon. Paul Crotty
United States District Court
Southern District of New York
500 Pearl Street, Room 735
New York, New York 10007

*Re: Price v. Price Novelli, Inc., et al.
07 Civ. 5869(PAC)*

Dear Judge Crotty:

We represent the plaintiff in the above-referenced FLSA putative collective action. This joint letter is submitted to respectfully request that this Court extend the fact and deposition cut-off dates from January 10, 2008 to March 14, 2008 (Supplemental and Amended Case Management and Scheduling Order attached). Counsel apologize to the Court for not submitting this request earlier.

As the undersigned set forth in my letter to the Court dated December 14, 2007, which was endorsed by Your Honor (attached hereto), it was anticipated that the proposed protective order would be submitted the week of December 17, 2007 and that depositions in this case would be completed in January 2008. Unfortunately, the Stipulated Protective Order, which Your Honor executed and filed on January 2, 2008, took longer than expected to be settled by the parties and was submitted on December 26, 2007, and Plaintiff's counsel has only started to review the box of documents produced by Defendants after execution of the protective order. Additionally, Plaintiff's counsel provided her documents to Defendants' counsel today, and Defendants are also compiling, reviewing and preparing to produce approximately 30,000 more pages of other documents, which counsel for Defendants expects to be produced sometime before the end of next week. Accordingly, the depositions of the parties cannot go forward until Plaintiff has had an opportunity to review Defendants' production. .

This is the first request for an extension of the Case Management dates. Thank you for your consideration of this request.

Respectfully submitted,

Andrew P. Bell (AB-1309)

cc: John D. Shyer (via email)

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**USDS SDNY
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 DOC #: _____
 DATE FILED: DEC 14, 2007**

December 14, 2007

VIA E-MAIL

Honorable Paul A. Crotty
 United States District Court
 For the Southern District of New York
 500 Pearl Street, Chambers 735
 New York, New York 10007

Application GRANTED. The conference is adjourned to
1/16/08 at 2:00 PM in Courtroom 20C.

SO ORDERED: DEC 14 2007

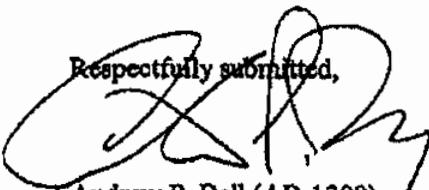
Fran K. Crotty
 HON. PAUL A. CROTTY
 UNITED STATES DISTRICT JUDGE

Dear Judge Crotty:

We represent Plaintiff Klesia Price in the above-referenced matter. We are writing on behalf of all parties to request an adjournment of the court conference presently scheduled for Wednesday, December 19, 2007 at 2:15 p.m.

The parties have been exchanging written discovery requests and responses in this case, and expect to submit during the week of December 17, 2007, a proposed confidentiality order. Following the execution of the confidentiality order, the parties will exchange documents and expect to schedule depositions to proceed during January 2008. Accordingly, the parties believe that a conference date in January would be more productive and fruitful for the Court, and respectfully request an adjournment to such a date to be set by the Court. The parties are available for an adjourned conference on January 14th, and 16th, 2008.

This is a second request for an adjournment. Thank you for your consideration of this request.

Respectfully submitted,

 Andrew P. Bell (AB-1309)

cc: Fran L. Rudich, Esq.
 John D. Shyer, Esq. (Via e-mail)

MEMO ENDORSED**MEMO ENDORSED**